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Attorneys for Defendant  
North American Title Company, Inc.

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA - SACRAMENTO DIVISION

KEITH T. TOWNS,

Plaintiff,

vs.

AMERIQUEST MORTGAGE COMPANY,  
TOWN AND COUNTRY TITLE SERVICES,  
INC., NORTH AMERICAN TITLE  
COMPANY, and DOES 1 TO 10, inclusive,

Defendants.

Case No. S-04-1855 FCD/PAN

STIPULATION TO EXTEND TIME TO  
DESIGNATE EXPERT WITNESSES

1 Plaintiff Keith T. Towns, defendant Ameriquest Mortgage Company, defendant Town &  
2 Country Title Services, Inc., and defendant North American Title Company, hereby enter into  
3 the following stipulation:

4  
5 **RECITALS**

6 WHEREAS, according to the December 30, 2004 Pretrial Scheduling Order, the last day to  
7 designate expert witnesses is currently set for September 9, 2005, and the last day to designate  
8 rebuttal expert witnesses is currently set for September 30, 2005;

9 WHEREAS, an extension of time to allow all parties an additional thirty days to designate  
10 expert witnesses will not unduly delay the proceedings in this Court;

11 **STIPULATION**

12 NOW, THEREFORE, plaintiff and defendants hereby stipulate by and through their  
13 respective counsel, as follows:

- 14 1. Plaintiff and defendants stipulate to extend the time within which all parties may  
15 designate in writing the expert witnesses they propose to tender at trial to October 14, 2005; and  
16 2. Plaintiff and defendants further stipulate to extend the time within which all parties  
17 may designate rebuttal expert witnesses to October 28, 2005.

18 Dated: September \_\_, 2005

LEWIS N. NELSON, ATTORNEY AT LAW

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21 By: /s/ - Lewis N. Nelson  
22 Lewis N. Nelson  
Attorney for Plaintiff Keith T. Towns

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25 ///

26 Dated: September \_\_, 2005

BUCHALTER NEMER  
A PROFESSIONAL CORPORATION

By: /s/ - Mia S. Blackler  
Mia S. Blackler  
Attorneys for Defendants Ameriquet  
Mortgage Company and Town & Country  
Title Services, Inc.

Dated: September \_\_, 2005

STEYER LOWENTHAL BOODROOKAS  
ALVAREZ & SMITH LLP

By: /s/ - Lisa Marie Williams  
Lisa Marie Williams  
Attorneys for Defendant North American  
Title Company

**ORDER**

Although, the foregoing stipulation does not clearly state the basis on which good cause exists the extension requested does not effect all other dates set in this action, therefore, IT IS HEREBY ORDERED THAT,

1. The deadline for all parties to designate expert witnesses shall be October 14, 2005;  
and
2. The deadline for all parties to designate rebuttal expert witness shall be October 28, 2005.
3. The parties shall review paragraph XI of the Court's Pretrial Scheduling Order, filed January 3, 2005 prior to any future requests for extension of deadlines.

Dated: September 12, 2005

/s/ Frank C. Damrell Jr.  
The Honorable Frank C. Damrell, Jr.  
United States District Judge